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16 MEGAN ROUP and THE SCULPT SOCIETY, LLC

17 UNITED STATES DISTRICT COURT
18 CENTRAL DISTRICT OF CALIFORNIA

19 TRACY ANDERSON MIND AND
20 BODY, LLC, a Delaware limited
21 liability company; and T.A. STUDIO
22 NEW YORK LLC, a California limited
23 liability company,

24 Plaintiffs,

25 v.

26 MEGAN ROUP, an individual; and
27 THE SCULPT SOCIETY, LLC, a
28 California limited liability company,

Defendants.

Case No. 2:22-cv-04735-RSWL-E

Hon. Ronald S.W. Lew

**DEFENDANTS MEGAN ROUP
AND THE SCULPT SOCIETY,
LLC'S ANSWER TO
PLAINTIFFS' FIRST AMENDED
COMPLAINT**

Complaint Filed: July 11, 2022
FAC Filed: Sept. 13, 2022
Trial Date: Not yet set

Answer to First Amended Complaint

Defendants Megan Roup (“Roup”) and The Sculpt Society, LLC (“The Sculpt Society” or “TSS”) (together, “Defendants”), by and through their attorneys, hereby submit their Answer to Plaintiffs Tracy Anderson Mind and Body, LLC (“TAMB”) and T.A. Studio New York LLC (“TANY,” and collectively, “Plaintiffs”) First Amended Complaint (“FAC”) in the above-captioned litigation (the “Action”). For the avoidance of doubt, Defendants deny any and all statements in the FAC section headings, prayer for relief, or otherwise made outside the numbered paragraphs therein.

Further, because the Court dismissed Plaintiffs’ Lanham Act and California Unfair Competition Law claims without prejudice (Dkt. No. 20) and Plaintiffs have elected not to amend those claims, no response is required to the allegations pertaining to those causes of action and, to the extent any response is required, such allegations are denied.

As to the allegations in the numbered paragraphs in the FAC, Defendants hereby answer and respond as follows:

1. Defendants deny the allegations in Paragraph 1 of the FAC and further deny knowledge or information sufficient to form a belief as to their truth.

2. Defendants deny the allegations in Paragraph 2 of the FAC and further deny knowledge or information sufficient to form a belief as to their truth.

3. Paragraph 3 of the FAC contains allegations of law, not fact, to which no response is required. To the extent the allegations require a response, Defendants deny them, and respectfully refer the Court to the document referenced therein for its terms. Defendant Roup only admits that she worked for TANY for a period of time.

4. Paragraph 4 of the FAC contains allegations of law, not fact, to which no response is required. To the extent the allegations require a response,

1 Defendants deny them. Defendant Roup only admits that she worked for TANY
2 for a period of time.

3 5. Defendants deny the allegations in Paragraph 5 of the FAC except
4 admit that: (i) Roup stopped working for TANY at one point in time; (ii) Roup
5 founded TSS, a fitness company; (iii) TSS offers in-person, online, and app-based
6 classes; and (iv) Roup has a background in dance.

7 6. Defendants deny the allegations in the first sentence of Paragraph 6 of
8 the FAC, except admit that Defendants offer a number of online and app-based
9 fitness classes to clients and have done so over a period of years. The allegations in
10 the second and third sentences of Paragraph 6 contains allegations of law, not fact,
11 to which no response is required. To the extent the allegations require a response,
12 Defendants deny them.

13 7. Defendants deny the allegations in Paragraph 7 of the FAC and
14 respectfully refer the Court to the materials referenced therein for their contents,
15 except admit that (i) Defendants have a number of clients and followers on social
16 media sites; and (ii) Roup worked for TANY for a period of time.

17 8. Paragraph 8 of the FAC contains allegations of law, not fact, to which
18 no response is required. To the extent the allegations require a response,
19 Defendants deny them.

20 9. Paragraph 9 of the FAC contains allegations of law, not fact, to which
21 no response is required. To the extent the allegations require a response,
22 Defendants deny them and respectfully refer the Court to the documents referenced
23 therein for their contents.

24 10. Paragraph 10 of the FAC contains allegations of law, not fact, to which
25 no response is required. To the extent the allegations require a response,
26 Defendants deny them.

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1 11. Paragraph 11 of the FAC contains allegations of law, not fact, to which
2 no response is required. To the extent the allegations require a response,
3 Defendants deny them.

4 12. Paragraph 12 of the FAC contains allegations of law, not fact, to which
5 no response is required. To the extent the allegations require a response,
6 Defendants deny them, except admit that The Sculpt Society conducts certain
7 business in Los Angeles, California.

8 13. Paragraph 13 of the FAC contains allegations of law, not fact, to which
9 no response is required. To the extent the allegations require a response,
10 Defendants deny them.

11 14. Defendants deny knowledge or information sufficient to form a belief
12 as to the truth of the allegations in Paragraph 14 of the FAC.

13 15. Defendants deny knowledge or information sufficient to form a belief
14 as to the truth of the allegations in Paragraph 15 of the FAC.

15 16. Admit.

16 17. Paragraph 17 of the FAC contains allegations of law, not fact, to which
17 no response is required. To the extent the allegations require a response,
18 Defendants deny them, except admit that The Sculpt Society conducts certain
19 business in Los Angeles, California.

20 18. Defendants deny knowledge or information sufficient to form a belief
21 as to the truth of the allegations in Paragraph 18 of the FAC.

22 19. Defendants deny the allegations in Paragraph 19 of the FAC, and
23 further deny knowledge or information sufficient to form a belief as to their truth.

24 20. Defendants deny knowledge or information sufficient to form a belief
25 as to the truth of the allegations in Paragraph 20 of the FAC.

26 21. Defendants deny knowledge or information sufficient to form a belief
27 as to the truth of the allegations in Paragraph 21 of the FAC.

1 22. Defendants deny knowledge or information sufficient to form a belief
2 as to the truth of the allegations in Paragraph 22 of the FAC.

3 23. Defendants deny the allegations in Paragraph 23 of the FAC, and
4 further deny knowledge or information sufficient to form a belief as to their truth.

5 24. Defendants deny knowledge or information sufficient to form a belief
6 as to the truth of the allegations in Paragraph 24 of the FAC.

7 25. Defendants deny the allegations in Paragraph 25 of the FAC, and
8 further deny knowledge or information sufficient to form a belief as to their truth.

9 26. Defendants deny the allegations in Paragraph 26 of the FAC.

10 27. Defendants deny the allegations in Paragraph 27 of the FAC, and
11 further deny knowledge or information sufficient to form a belief as to their truth,
12 except admit that Roup worked for TANY at one point in time.

13 28. Defendants deny the allegations in Paragraph 28 of the FAC, and
14 further deny knowledge or information sufficient to form a belief as to their truth.
15 Defendants respectfully refer the Court to the document(s) referenced in Paragraph
16 28 for their terms.

17 29. Paragraph 29 of the FAC contains allegations of law, not fact, to which
18 no response is required. To the extent the allegations require a response,
19 Defendants deny them. Defendants further deny the remainder of the allegations in
20 Paragraph 29 and respectfully refer the Court to the documents referenced therein
21 for their terms.

22 30. Paragraph 30 of the FAC contains allegations of law, not fact, to which
23 no response is required. To the extent the allegations require a response,
24 Defendants deny them, and further deny the remainder of the allegations in
25 Paragraph 30, except admit that Roup was provided certain materials and
26 information while working for TANY.

27 31. Defendants deny the allegations in Paragraph 31 of the FAC, and
28 further deny knowledge or information sufficient to form a belief as to their truth,

1 except admit that Roup was provided certain materials and information while
2 working for TANY. Defendants respectfully refer the Court to the documents
3 referenced therein for their contents.

4 32. Paragraph 32 of the FAC contains allegations of law, not fact, to which
5 no response is required. To the extent the allegations require a response,
6 Defendants deny them, except admit that Roup worked for TANY for a period of
7 time and respectfully refer the Court to the materials referenced therein for their
8 contents.

9 33. Defendants deny the allegations in Paragraph 33 of the FAC, including
10 on the basis that Defendants presently lack knowledge or information sufficient to
11 form a belief as to their truth, and respectfully refer the Court to the document
12 referenced therein for its contents, except admit that Roup stopped working for
13 TANY at one point in time.

14 34. Defendants deny the allegations in Paragraph 34 of the FAC, except
15 admit that: (i) Roup stopped working for TANY at one point in time; (ii) Roup
16 founded TSS, a fitness company; and (iii) TSS offers in-person, online, and app-
17 based classes.

18 35. Defendants deny the allegations in Paragraph 35 of the FAC, except
19 admit that TSS offers online and app-based classes, and respectfully refer the Court
20 to the document referenced therein for its contents.

21 36. Defendants deny the allegations in Paragraph 36 of the FAC except
22 admit that Roup has a background and training in dance.

23 37. Paragraph 37 of the FAC contains allegations of law, not fact, to which
24 no response is required. To the extent the allegations require a response,
25 Defendants deny them. Defendants further deny the remainder of the allegations in
26 Paragraph 37 except admit that Defendants offer a number of online and app-based
27 fitness classes to clients—including, at various times, the four classes referenced in
28 Paragraph 37—and have done so for a period of years.

1 38. Paragraph 38 of the FAC contains allegations of law, not fact, to which
2 no response is required. To the extent the allegations require a response,
3 Defendants deny them, and further deny the remainder of the allegations in
4 Paragraph 38.

5 39. Paragraph 39 of the FAC contains allegations of law, not fact, to which
6 no response is required. To the extent the allegations require a response,
7 Defendants deny them, and further deny the remainder of the allegations in
8 Paragraph 39.

9 40. Paragraph 40 of the FAC contains allegations of law, not fact, to which
10 no response is required. To the extent the allegations require a response,
11 Defendants deny them. Defendants further deny the remainder of the allegations in
12 Paragraph 40, except admit that Defendants have a number of clients and followers
13 on social media sites.

14 41. Defendants deny the allegations in Paragraph 41 of the FAC and
15 respectfully refer the Court to the materials referenced therein for their contents,
16 except admit that Roup worked for TANY for a period of time and that The Sculpt
17 Society's website does not mention TANY or Anderson.

18 42. Defendants deny the allegations in Paragraph 42 of the FAC.

19 43. Defendants respectfully refer the Court to the materials referenced in
20 Paragraph 43 of the FAC for their contents. To extent the allegations in Paragraph
21 43 require a response, Defendants deny them, except admit that Roup has made
22 certain public statements about her life and TSS.

23 44. Paragraph 44 of the FAC contains allegations of law, not fact, to which
24 no response is required. To the extent the allegations require a response,
25 Defendants deny them. Defendants deny knowledge or information sufficient to
26 form a belief as to the truth of the remainder of the allegations in Paragraph 44 and
27 respectfully refer the Court to the materials referenced therein for their contents.
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1 45. Defendants deny knowledge or information sufficient to form a belief
2 as to the truth of the allegations in Paragraph 45 of the FAC and respectfully refer
3 the Court to Attachment A to the FAC for its contents.

4 46. Defendants deny the allegations in Paragraph 46 of the FAC and
5 further deny knowledge or information sufficient to form a belief as to the truth of
6 the remainder of the allegations in Paragraph 46.

7 47. Paragraph 47 of the FAC contains allegations of law, not fact, to which
8 no response is required. To the extent the allegations require a response,
9 Defendants deny them.

10 48. Paragraph 48 of the FAC contains allegations of law, not fact, to which
11 no response is required. To the extent the allegations require a response,
12 Defendants deny them.

13 49. Paragraph 49 of the FAC contains allegations of law, not fact, to which
14 no response is required. To the extent the allegations require a response,
15 Defendants deny them, and further deny the remainder of the allegations in
16 Paragraph 49, including on the basis that Defendants lack knowledge or
17 information sufficient to form a belief as to their truth.

18 50. Defendants incorporate by reference the responses above to
19 Paragraphs 1 through 49 of the FAC, as though fully set forth herein.

20 51. Paragraph 51 of the FAC contains allegations of law, not fact, to which
21 no response is required. To the extent the allegations require a response,
22 Defendants deny them.

23 52. Paragraph 52 of the FAC contains allegations of law, not fact, to which
24 no response is required. To the extent the allegations require a response,
25 Defendants deny them.

26 53. Paragraph 53 of the FAC contains allegations of law, not fact, to which
27 no response is required. To the extent the allegations require a response,
28 Defendants deny them.

1 54. Paragraph 54 of the FAC contains allegations of law, not fact, to which
2 no response is required. To the extent the allegations require a response,
3 Defendants deny them.

4 55. Paragraph 55 of the FAC contains allegations of law, not fact, to which
5 no response is required. To the extent the allegations require a response,
6 Defendants deny them.

7 56. Paragraph 56 of the FAC contains allegations of law, not fact, to which
8 no response is required. To the extent the allegations require a response,
9 Defendants deny them.

10 57. In its December 12, 2022 Order, the Court dismissed Plaintiffs' claim
11 for violation of the Lanham Act, 15 U.S.C. § 1125(a) with leave to amend.
12 Plaintiffs elected not to amend their FAC and have thus abandoned this claim. As
13 such, no response is required to the allegations in Paragraph 57. To the extent a
14 response is required, Defendants respond as follows: Defendants incorporate by
15 reference the responses above to Paragraphs 1 through 56 of the FAC, as though
16 fully set forth herein.

17 58. In its December 12, 2022 Order, the Court dismissed Plaintiffs' claim
18 for violation of the Lanham Act, 15 U.S.C. § 1125(a) with leave to amend.
19 Plaintiffs elected not to amend their FAC and have thus abandoned this claim. As
20 such, no response is required to the allegations in Paragraph 58. To the extent a
21 response is required, Defendants respond as follows: Paragraph 58 of the FAC
22 contains allegations of law, not fact, to which no response is required. To the
23 extent the allegations require a response, Defendants deny them.

24 59. In its December 12, 2022 Order, the Court dismissed Plaintiffs' claim
25 for violation of the Lanham Act, 15 U.S.C. § 1125(a) with leave to amend.
26 Plaintiffs elected not to amend their FAC and have thus abandoned this claim. As
27 such, no response is required to the allegations in Paragraph 59. To the extent a
28 response is required, Defendants respond as follows: Paragraph 59 of the FAC

1 contains allegations of law, not fact, to which no response is required. To the
2 extent the allegations require a response, Defendants deny them.

3 60. In its December 12, 2022 Order, the Court dismissed Plaintiffs' claim
4 for violation of the Lanham Act, 15 U.S.C. § 1125(a) with leave to amend.
5 Plaintiffs elected not to amend their FAC and have thus abandoned this claim. As
6 such, no response is required to the allegations in Paragraph 60. To the extent a
7 response is required, Defendants respond as follows: Paragraph 60 of the FAC
8 contains allegations of law, not fact, to which no response is required. To the
9 extent the allegations require a response, Defendants deny them.

10 61. In its December 12, 2022 Order, the Court dismissed Plaintiffs' claim
11 for violation of the Lanham Act, 15 U.S.C. § 1125(a) with leave to amend.
12 Plaintiffs elected not to amend their FAC and have thus abandoned this claim. As
13 such, no response is required to the allegations in Paragraph 61. To the extent a
14 response is required, Defendants respond as follows: Paragraph 61 of the FAC
15 contains allegations of law, not fact, to which no response is required. To the
16 extent the allegations require a response, Defendants deny them.

17 62. In its December 12, 2022 Order, the Court dismissed Plaintiffs' claim
18 for violation of the Lanham Act, 15 U.S.C. § 1125(a) with leave to amend.
19 Plaintiffs elected not to amend their FAC and have thus abandoned this claim. As
20 such, no response is required to the allegations in Paragraph 62. To the extent a
21 response is required, Defendants respond as follows: Paragraph 62 of the FAC
22 contains allegations of law, not fact, to which no response is required. To the
23 extent the allegations require a response, Defendants deny them.

24 63. In its December 12, 2022 Order, the Court dismissed Plaintiffs' claim
25 for violation of the Lanham Act, 15 U.S.C. § 1125(a) with leave to amend.
26 Plaintiffs elected not to amend their FAC and have thus abandoned this claim. As
27 such, no response is required to the allegations in Paragraph 63. To the extent a
28 response is required, Defendants respond as follows: Paragraph 63 of the FAC

1 contains allegations of law, not fact, to which no response is required. To the
2 extent the allegations require a response, Defendants deny them.

3 64. Defendants incorporate by reference the responses above to
4 Paragraphs 1 through 63 of the FAC, as though fully set forth herein.

5 65. Paragraph 65 of the FAC contains allegations of law, not fact, to which
6 no response is required. To the extent the allegations require a response,
7 Defendants deny them and respectfully refer the Court to the document referenced
8 therein for its terms.

9 66. Paragraph 66 of the FAC contains allegations of law, not fact, to which
10 no response is required. To the extent the allegations require a response,
11 Defendants deny them.

12 67. Paragraph 67 of the FAC contains allegations of law, not fact, to which
13 no response is required. To the extent the allegations require a response,
14 Defendants deny them.

15 68. Paragraph 68 of the FAC contains allegations of law, not fact, to which
16 no response is required. To the extent the allegations require a response,
17 Defendants deny them, except admit that TSS offers online and app-based classes.

18 69. Paragraph 69 of the FAC contains allegations of law, not fact, to which
19 no response is required. To the extent the allegations require a response,
20 Defendants deny them.

21 70. In its December 12, 2022 Order, the Court dismissed Plaintiffs' claim
22 for violation of California's Unfair Competition Law, Cal. Bus. & Prof. Code §§
23 17200, *et seq.*, with leave to amend. Plaintiffs elected not to amend their FAC and
24 have thus abandoned this claim. As such, no response is required to the allegations
25 in Paragraph 70. To the extent a response is required, Defendants respond as
26 follows: Defendants incorporate by reference the responses above to Paragraphs 1
27 through 69 of the FAC, as though fully set forth herein.

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1 71. In its December 12, 2022 Order, the Court dismissed Plaintiffs' claim
2 for violation of California's Unfair Competition Law, Cal. Bus. & Prof. Code §§
3 17200, *et seq.*, with leave to amend. Plaintiffs elected not to amend their FAC and
4 have thus abandoned this claim. As such, no response is required to the allegations
5 in Paragraph 71. To the extent a response is required, Defendants respond as
6 follows: Paragraph 71 of the FAC contains allegations of law, not fact, to which no
7 response is required. To the extent the allegations require a response, Defendants
8 deny them.

9 72. In its December 12, 2022 Order, the Court dismissed Plaintiffs' claim
10 for violation of California's Unfair Competition Law, Cal. Bus. & Prof. Code §§
11 17200, *et seq.*, with leave to amend. Plaintiffs elected not to amend their FAC and
12 have thus abandoned this claim. As such, no response is required to the allegations
13 in Paragraph 72. To the extent a response is required, Defendants respond as
14 follows: Paragraph 72 of the FAC contains allegations of law, not fact, to which no
15 response is required. To the extent the allegations require a response, Defendants
16 deny them.

17 73. In its December 12, 2022 Order, the Court dismissed Plaintiffs' claim
18 for violation of California's Unfair Competition Law, Cal. Bus. & Prof. Code §§
19 17200, *et seq.*, with leave to amend. Plaintiffs elected not to amend their FAC and
20 have thus abandoned this claim. As such, no response is required to the allegations
21 in Paragraph 73. To the extent a response is required, Defendants respond as
22 follows: Paragraph 73 of the FAC contains allegations of law, not fact, to which no
23 response is required. To the extent the allegations require a response, Defendants
24 deny them.

25 The Prayer contains contentions of law to which no response is required. To
26 the extent a response is required, Defendants deny that Plaintiffs are entitled to any
27 relief including the relief sought therein.

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1 **AFFIRMATIVE DEFENSES**

2 Defendants repeat and reallege every paragraph set forth above as if they
3 were fully set forth herein. Defendants assert affirmative defenses as to Plaintiffs'
4 claims for copyright infringement (Claim 1) and breach of contract (Claim 3).
5 Because Plaintiffs declined to amend the FAC as to their claims for violation of the
6 Lanham Act (Claim 2) and violation of California's Unfair Competition Law
7 (Claim 4), Plaintiffs have abandoned those claims and Defendants need not and do
8 not assert affirmative defenses to them. Defendants reserve the right to assert
9 affirmative defenses as to Claim 2 and Claim 4, should it be determined that those
10 claims are still at issue.

11 By alleging defenses herein, Defendants do not intend to alter the burden of
12 proof or burden of going forward with the evidence that otherwise exists with
13 respect to any particular issue at law or in equity. All defenses are pleaded in the
14 alternative and do not constitute an admission either of liability or as to whether
15 Plaintiffs are entitled to any relief whatsoever. Furthermore, Defendants reserve
16 their right to supplement the below affirmative defenses, including, without
17 limitation, as a result of new information obtained through discovery.

18 **FIRST AFFIRMATIVE DEFENSE**

19 Plaintiffs' claims are barred in whole or in part because the FAC fails to state
20 a claim upon which relief may be granted.

21 **SECOND AFFIRMATIVE DEFENSE**

22 Plaintiffs' claims are barred in whole are in part because Plaintiffs' exercise
23 routines are not original to Plaintiffs or otherwise protectable in whole or in part
24 under the Copyright Act.

25 **THIRD AFFIRMATIVE DEFENSE**

26 Plaintiffs' claims are barred in whole or in part because Plaintiffs lack
27 standing to bring their claims.

FOURTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred in whole or in part because Defendants' exercise routines were independently created.

FIFTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred in whole or in part because Defendants did not commit any act of infringement.

SIXTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred in whole or in part because, without admitting the use of any copyrighted material allegedly owned by Plaintiffs, any alleged use was *de minimis*.

SEVENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred in whole or in part because Defendants' alleged infringement is pursuant to an implied license and/or Plaintiffs acquiesced in, waived, and/or are estopped from challenging Defendants' alleged acts.

EIGHTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred in whole or in part by the doctrine of fair use.

NINTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred in whole or in part because Plaintiffs lack valid copyright registration(s) for any protectible choreography.

TENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred in whole or in part because Defendants did not act willfully.

ELEVENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred in whole or in part because some or all of Roup's contract with TANY is unenforceable as against public policy and state law.

TWELFTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred in whole or in part by the applicable statutes of limitations.

THIRTEENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred in whole or in part by the unclean hands doctrine.

FOURTEENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred in whole or in part by the doctrine of waiver.

FIFTEENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred in whole or in part by the doctrine of laches.

SIXTEENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred in whole or in part by the doctrine of estoppel.

SEVENTEENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred in whole or in part because Plaintiffs have failed to mitigate their alleged damages, if any.

EIGHTEENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred in whole or in part because Plaintiffs' alleged damages, if any, are the sole and direct result of forces, acts, and omissions independent of Defendants.

NINETEENTH AFFIRMATIVE DEFENSE

Without in any way admitting any of the allegations contained in the FAC, Defendants' alleged use of Plaintiffs' exercise routines did not proximately cause any of Plaintiffs' alleged damages or any of the alleged profits.

TWENTIETH AFFIRMATIVE DEFENSE

Any amount of damages awarded to Plaintiffs and against Defendants should be reduced by the sums that Plaintiffs owe Defendants under the doctrines of offset and recoupment.

TWENTY-FIRST AFFIRMATIVE DEFENSE

Plaintiffs' prayer for injunctive relief is barred because Plaintiffs have an adequate remedy at law.

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1 **WHEREFORE**, Defendants pray for judgment dismissing the FAC in its
2 entirety, awarding Defendants their costs and attorneys' fees, and for such other
3 relief as the Court deems just and proper.

4 **DEMAND FOR JURY TRIAL**

5 Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Defendants
6 hereby demand their right to trial by jury of all claims in this Action triable by jury.
7

8 Dated: January 18, 2023

MANATT, PHELPS & PHILLIPS, LLP

9
10 By: /s/ Nathaniel L. Bach

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